

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 19-cv-08655 (JHR)

**NOTICE OF PLAINTIFF'S MOTION FOR INSTATEMENT,  
PERMANENT INJUNCTION, AND OTHER POST JUDGMENT RELIEF**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Declarations of Nora Ostrofe and Gregory S. Chiarello, and Exhibits attached thereto, Plaintiff Ulku Rowe shall move this Court for the following relief (1) reinstatement of Plaintiff to Level 9, (2) reinstatement of Plaintiff to the VPFS-Sales or an equivalent position, or if reinstatement is infeasible, an award of front pay damages, (3) declaration that Google has violated the NYLL and NYCHRL and a permanent injunction enjoining it from future discrimination and retaliation against Plaintiff, (4) an award of monetary relief to offset tax consequences to Plaintiff, and (5) an award of pre- and post-judgment interest.

Dated: November 22, 2023  
New York, New York

Respectfully submitted,  
By: /s/ Cara E. Greene  
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**CERTIFICATE OF SERVICE**

I hereby certify that on Wednesday, November 22, 2023, I filed the foregoing document using the Court's CM/ECF filing system, which will automatically send e-mail notification of such filing to the following individuals of record:

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/s/ Cara E. Greene  
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